

# **EXHIBIT 3**

**From:** David Perlson  
**Sent:** Wednesday, June 28, 2017 6:46 PM  
**To:** UberWaymoMoFoAttorneys; Boies Service (BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com); DG-GPOttoTruckingWaymo@goodwinlaw.com; John Cooper (JCooper@fbm.com); Matthew Cate (MCate@fbm.com)  
**Cc:** QE-Waymo  
**Subject:** Waymo v. Uber Deposition Scheduling

John and counsel,

As part of our continuing efforts to work cooperatively and proactively on deposition scheduling to avoid disputes and to get depositions done in a timely manner, we suggest the parties exchange a list of remaining witnesses they presently intend to depose with the goal of working together on a schedule for these depositions within the next week. Exchange of these lists, and the planning of these depositions now, would be without prejudice to making revisions to the lists based upon information, including identification of people whose relevant knowledge a party is not aware of, learned in discovery or otherwise, including but not limited to: further supplemental Initial Disclosures, document productions, responses to Interrogatories and Requests for Admission, and deposition testimony. Obviously, the production of the Due Diligence report could impact whom Waymo deposes, and may warrant depositions of one or all of the witnesses that Defendants have identified as have received the Due Diligence Report and/or its exhibits. Additionally, we note that Defendants have identified over seventy-five potential witnesses in their disclosures, and that Judge Alsup has indicated that "everyone of those people [on Defendants' Initial Disclosures] ought to be deposed." (6/7/2016 Hearing Tr. at 68:24-25.) However, we do not want to waste the parties' and witnesses' time on witnesses that are not relevant and whom Defendants do not intend to call at trial. We suggest the parties discuss how to address this on our next meet and confer.

To get the ball rolling on this process the following is the list of additional the witnesses whose depositions Waymo presently intends to take. Please provide your list tomorrow afternoon so we can work on getting the remaining depositions scheduled.

<u>Deponent</u>	<u>Location</u>
Uber (30(b)(6))	San Francisco
Otto Trucking (30(b)(6))	San Francisco
Ottomotto (30)(b)(6)	San Francisco
Radu Raduta	San Francisco
John Bares	Pittsburgh
Daniel Gruver	San Francisco
Don Burnette	San Francisco
James Haslim	San Francisco
Soren Juelsgaard	San Francisco
Colin Sebern	San Francisco
Scott Boehmke	Pittsburgh
Eric Friedberg	New York
Lior Ron	San Francisco
Stefanie Olsen	San Francisco
Rudy Kim	San Francisco
Bill Gurley	San Francisco
Jeff Holden	San Francisco

<u>Deponent</u>	<u>Location</u>
Gaetan Pennecot	San Francisco
Cameron Poetzscher	San Francisco
Nina Qi	San Francisco

David

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